

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

7 WEST 57TH STREET REALTY COMPANY,
LLC, a Delaware Limited Liability Company,

Plaintiff,

vs.

CITIGROUP, INC., CITIBANK, N.A., BANK OF
AMERICA CORP., BANK OF AMERICA N.A.,
BARCLAYS BANK PLC, UBS AG, JPMORGAN
CHASE & CO., JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION, CREDIT SUISSE
GROUP AG, BANK OF TOKYO-MITSUBISHI
UFJ LTD., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A., HSBC
HOLDINGS PLC, HSBC BANK PLC, HBOS PLC,
LLOYDS BANKING GROUP PLC, ROYAL
BANK OF CANADA, THE NORINCHUKIN
BANK, ROYAL BANK OF SCOTLAND GROUP,
PLC, WESTLB AG, WESTDEUTSCHE
IMMOBILIENBANK AG, DEUTSCHE BANK
AG,

Defendants.

Civil Action No. 13-cv-0981

ECF Case

ORAL ARGUMENT REQUESTED

**PLAINTIFF 7 WEST 57th STREET REALTY COMPANY LLC'S
NOTICE OF MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, Plaintiff 7 West 57th Street Realty Company, LLC ("Plaintiff"), shall move, before the Honorable Paul G. Gardephe, United States District Judge, United States Courthouse, Courtroom 705, 40 Foley Square, New York, New York, 10007, for the entry of an Order pursuant to Rule 15(a) of the Federal Rules of Civil Procedure granting Plaintiff leave to file a Second Amended Complaint.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon this Notice of Motion, the Memorandum of Law in Support of Motion for Leave to File Second Amended Complaint, and the Proposed Second Amended Complaint, submitted herewith, in support of its motion.

DATED: June 1, 2015

Respectfully submitted,

/s/ Daniel J. Mogin

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*Attorneys for Plaintiff 7 West 57th Street
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